

# FIBERS SITE GROUP

February 10, 2015

*Via Email Electronic Copy*

Adalberto Bosque, PhD, MBA, REM, CEA  
Response and Remediation Branch  
U.S Environmental Protection Agency  
City View Plaza II - Suite 7000  
48 RD, 165 Km. 1.2  
Guaynabo, PR 00968-8069

Subject: RD/RA Monthly Report –January 2015  
Fibers Public Supply Wells Site  
Guayama, Puerto Rico

Dear Mr. Bosque:

On behalf of the Fibers Public Supply Wells Site Settling Defendants, we are submitting the attached RD/RA Monthly Report prepared pursuant to the Consent Decree (Civil Action No. 92-2486) in the matter of *United States v. Anaquest Caribe, Inc. et al*, Section IX, Paragraph 30, Reporting Requirements.

Please feel free to contact Mr. James Kirschner of ARCADIS at (602) 797-4519 or me at (724) 544-4874 if you have any questions or comments regarding this submittal.

Sincerely,



Joe Biss, CHMM  
Fibers Site Group Project Coordinator  
EHS Support LLC

Copies:

Chief, New York/Caribbean Superfund Branch, Attn. Mel Hauptman- via email only  
Ms. Evelyn Rivera-Ocasio, Assitant Regional Counsel – Carribean Programs – via email only  
Chief, Environmental Enforcement Division, U.S. Department of Justice (DOJ #90-11-2-768)  
Amarilis Rodríguez Méndez, State Remedial Project Manager, Puerto Rico Environmental Quality Board- via email only  
Ms. Katherine Mishkin, Hydrolgeologist, USEPA Superfund Technical Support Section – via email only  
Ms. Enid Díaz, Departamento de Recursos Naturales y Ambientales  
Mr. Jorge Morales, PRIDCO - via email only  
Mr. Joel Melendez Rodriguez, PRIDCO - via email only  
Ms. Ana Palou Balsa, PRIDCO – via email only  
Mr. Dan Vineyard, Jackson Walker- via email only  
James Kirschner, Arcadis - via email only

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**(a) Description of actions which have been taken toward achieving compliance with this Decree.**

Fibers Air Stripping System

QED Environmental Systems, Inc. (QED) completed manufacturing an EZ-48.4SS Tray air stripper assembly as noted and approved in the United States Environmental Protection Agency (USEPA) letter (January 27, 2014). The QED air stripper equipment was shipped to the Baxter-Guayama facility at the Fibers Site for temporary storage in January 2015.

The Fibers Site Group prepared and submitted a Request for Proposal (RFP) packet, in December 2014, for the demolition, removal and disposal of a portion of the existing air stripper remediation system at the Fibers Site to the following three local equipment demolition contractors:

- Homeca Recycling – Demo Services (Homeca); Ponce, PR
- Caribe Hydroblasting Corporation (CHC); Peñuelas, PR
- Central Waste Services, Inc. (CWS); Barceloneta, PR

ARCADIS U.S., Inc. (ARCADIS) received equipment demolition, removal and disposal bids from two local contractors (Homeca and CWS) on January 6, 2015. ARCADIS is evaluating the bids.

The Fibers Site Group is preparing construction design drawings that will include the installation of the new air stripper remediation system, Point of Compliance and treated effluent water pipeline to the Phillips Ditch located southwest of the Chevron Phillips Chemical Company Puerto Rico CORE (CORE) facility. Draft construction design drawings will be submitted to the USEPA for review and comment.

Representatives of the Fibers Site Group met with representatives of the Puerto Rico Land Administration and Puerto Rico Industrial Development Company (PRIDCO) on January 26 and 28, 2015 to discuss procedures to obtain easements for the proposed treated effluent water pipeline at the CORE facility and treated water discharge into the Phillips Ditch.

**(b) Summary of all sampling results and tests, and all other data received or generated by Settling Defendants.**

The Fibers Site Group received groundwater laboratory analytical data from the second semi-annual groundwater monitoring event of 2014. The validated laboratory analytical data will be submitted with the second semi-annual groundwater monitoring and sampling report for 2014.

**(c) List of all work plans, plans and other deliverables completed and submitted.**

The Fibers Site Group submitted draft demolition drawings to the USEPA for review and comment regarding the removal and disposal of a portion of the existing air stripper remediation system in November 2014 with the requested hard copies delivered to the Agency in December 2014.

**(d) Description of all actions, including, but not limited to, data collection and implementation of work plans, which are scheduled for the next six weeks.**

The second semi-annual groundwater monitoring and sampling event of 2014 was completed on November 21, 2014. The final laboratory analytical data was received and validated in December 2014. The second semi-annual groundwater monitoring and sampling report for 2014 is anticipated to be completed and submitted in February 2015.

Baxter International, Inc. (Baxter) contracted with Environmental Resource Technologies (ERTEC) to conduct a subsurface soil investigation at the Baxter-Guayama facility on the Fibers Site. On behalf of Baxter, ERTEC's proposed subsurface soil investigation effort includes drilling 22 soil borings at the Baxter-Guayama facility. The attached Figure depicts proposed ERTEC soil boring locations. Drilling commenced at the Baxter-Guayama facility on February 3, 2015.

At the request of the USEPA Remedial Project Manager, the Fibers Site Group is evaluating an alternative method to discharge treated water for beneficial use. The Fibers Site Group will prepare a technical memorandum regarding the feasibility of discharging treated water to an infiltration basin. An Infiltration Basin Technical Memorandum will be prepared and submitted to the USEPA for review and comment.

**(e) Information regarding the percentage completion, unresolved delays encountered or anticipated.**

It is anticipated that some time will be needed for coordination with the Oficina de Gerencia de Permisos (OGPe) in regards to the demolition of certain portions of the existing treatment facility and the reconstruction of the improved treatment system, installation of the new air stripper, Point of Compliance telemetry and treated effluent water pipeline. The USEPA Remedial Project Manager indicated on December 16, 2014 (via email) that he had reached out to Amarilis Rodriguez (Puerto Rico Environmental Quality Board [EQB]) and that she would follow up with information to the Group related to the demolition coordination.

The Fibers Site Group submitted the following correspondence to the USEPA and EQB to expedite Agency concurrence with demolition of certain portions of the existing treatment facility, treated water discharge constituent monitoring requirements and proposed discharge to the Phillips Ditch:

- *Remediation System Air Stripper Effluent Concentrations Compared to ARAR-Based Discharge Criteria*. October 14, 2014 (sent via e-mail to USEPA and EQB on October 14, 2014).
- *Draft Demolition Plan for Fibers Public Supply Wells Superfund Site*. November 10, 2014 (sent via email to USEPA on November 19, 2014 and two hard copies of drawings sent via FedEx to USEPA and SharePoint link provided via e-mail on December 23, 2014).

At this time, the Fibers Site Group has not received a response from the Agencies regarding the ARAR-Based Discharge Criteria document or the Draft Demolition Plan. Coordination with the Agencies on these submittals, if any material comments need to be addressed, is necessary to move forward with the CERCLA 121(e) permit equivalency and promptly returning the treatment system to service.

**(f) List of any modification to work plans or other schedules the Settling Defendants have proposed.**

None.

**(g) Description of activities undertaken in support of the Community Relations Plan.**

No support activities have been requested for the next planning period.

**(h) Actions undertaken to address outside parties concerns.**

No concerns from outside parties were encountered during this reporting period.



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